

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ESSILOR INTERNATIONAL SAS and  
ESSILOR MANUFACTURING (THAILAND)  
CO., LTD.,

Plaintiffs,

v.

J.P. MORGAN CHASE BANK, N.A.,

Defendant.

Case No. 1:22-cv-03361

**ORAL ARGUMENT REQUESTED**

**NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant JPMorgan Chase Bank, N.A. (“JPMC”) respectfully moves this Court for an order dismissing the complaint (Dkt. No. 1) of Plaintiffs Essilor International SAS and Essilor Manufacturing (Thailand) Co., Ltd., and for such other and further relief as the Court deems just, necessary, and proper.

The grounds for this motion are based on the Memorandum of Law in Support of JPMC’s Motion to Dismiss, the supporting Declaration of Dragana Kosanovic and exhibits thereto, the supporting Declaration of Siriwan Premplumjit and exhibits thereto, all papers and pleadings from this case on file with the Court, all other matters of which the Court may take judicial notice, any further evidence or argument offered to the Court at the hearing on this motion, and any other matters that the Court may consider.

Dated: July 15, 2022

Respectfully Submitted,

/s/ Alan E. Schoenfeld  
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